

Mallinckrodt General Correspondence

MEMO TO: Roger Wieting
FROM: Bernie Rains
SUBJECT: River Stage Impacts On Mallinckrodt Surcharge Assessment
DATE: April 19, 1983

File

George Schillinger has stated, based on information provided to him by the "Overflow Study" and John Koeper, that wastewaters and sewer solids from the Mallinckrodt Chemical Company are not received for treatment at the Bissell Point Sewage Treatment Plant above Mississippi River stage 10. If true, this raises a question with respect to the equity of surcharge assessments not only for Mallinckrodt at river stage above 10, but also for other industries at river stages above 20.

I, nor you, are completely familiar with the operation of the collection system diversion structures and pump stations to comment unequivocally whether Mallinckrodt wastes are discharged directly to the river above stage 10. Because of the implications associated with such conditions, verification and documentation of flow patterns are suggested. Comparison of river stage with actual gate closings and other evidence of flow routing would help clarify this situation.

I recall a similar problem in determining the route of wastewaters from the Great Lakes Container Corporation. Our Maintenance Department had to conduct a very detailed investigation to determine where the Company's wastes entered our sewer system. It was discovered the sewer system serving their plant had not been intercepted and consequently, as I recall, surcharges paid by the company were refunded. Unfortunately, no credit was given by the Company to the District for preventing the imposition of an NPDES permit for their "direct discharge."

Do you have any comment regarding Mallinckrodt's situation or advice on what future action should be taken?

BAR:kat

cc: George Schillinger ✓
John Koeper

BTR

Offer Rate Reduction -

- Premature

- Not required to do now
- Could be done later
- Don't know what else may happen -
- Why Volunteer at this Time -
 - May call attention to past operating Proactive
 - May need this as a negotiating point -
 - Should not give it away in advance -
 - May want to lay this off against alleged charges from Malin - due to Sewer Collapse

- If done after system is returned to normal -

- We have held our cards until everything is on table
- Can do at anytime
- Could avoid any attention to past operation after return to "normal"

Surcharge is based upon our average cost of treatment under system as is.

Including various industries being diverted at higher river stages -

If all were not charge the same but based upon river stages -

Rate higher

Those being treated would pay more

Be to industries benefit to pollute -

This is a policy decision -

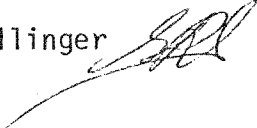
During the whole collapse period
Mall. waste is being handled
as it normally would be -

One reacting

Problem has been here all along and everyone is aware that at various river stages specific ^{branch sewer} interceptors ~~are~~ were isolated from the interceptors and all flow from French rivers including those industries in a discharge category were being bypassed.

~~Don~~
Rains had worked on the initial development of the "Overflow Regulation" study and had access to the data that indicates Salisbury is isolated at stages 10 to 12 feet —

~~Under design conditions, Salisbury would have been~~

MEMORANDUM TO: Bernie Rains
FROM: George R. Schillinger 
RE: Mallinckrodt
DATE: April 20, 1983

Jack Frauenhoffer (982-5112) called this morning as a follow up to my discussion with Fulghom of yesterday. He apparently thought that the flow from the equalization basins was being intercepted even with the collapse at Salisbury. I told him that I did not think so but that I would verify the present status and the expected date of interception.

I called John Koeper and he confirmed that the discharge from the equalization basins was going directly to the river by way of the Destrehan sewer. He estimated that the completion of the repair work would take 30 days after the Mississippi River had fallen to stage 20 feet.

This information was relayed to Jack Frauenhoffer. He asked that he be informed when their flow was redirected to the system and when they could clean their basins. I told him that I would keep him informed.

GRS:smr

CC: R. Wieting

METROPOLITAN ST. LOUIS SEWER DISTRICT



February 5, 1986

File

Mr. Craig Johler
Environmental Engineering
Mallinckrodt, Incorporated
Mallinckrodt and Second Streets
P.O. Box 5439
St. Louis, Missouri 63147

Dear Mr. Johler:

We have received your notification dated January 17, 1986 concerning the quantity of excess suspended solids discharged to the public sewer from your Sumac Tannin process. You have indicated 468 tons of solids were discharged during the second semi-annual period of 1985. During this period the net unit charge for treatment of excess suspended solids was \$82.00 per ton as specified in Ordinance No. 5921.

Based on the tonnage information you have provided and the rate in effect at the time of discharge, the surcharge for treating your waste sumac tannin sludge is \$38,376.00. By copy of this letter, I am requesting our Finance Department bill you for this total amount. As we understand, the billing should be sent to your attention for proper handling.

If you have any question or we can be of further assistance, please contact us.

Sincerely,

Bernard A. Rains, P.E., Manager
Industrial Pollution Control

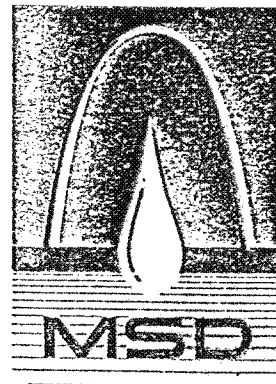
BAR:kat

cc: Helen Williams
Al Callier

FILE

Bissell

METROPOLITAN ST. LOUIS SEWER DISTRICT



August 2, 1983

File

Mr. Jack Fraenhoffer
Engineering Services Supervisor
Mallinckrodt, Incorporated
Mallinckrodt and Second Streets
P.O. Box 5439
St. Louis, Missouri 63147

Dear Mr. Fraenhoffer:

In your letter dated July 17, 1983 you requested approval to continue discharging your existing level of iron to our Bissell Point Sewage Treatment Plant. Your request was in accordance with our Ordinance 4786, Article IV, Section Two.

Data that we have generated from analyses of your discharge indicates the iron concentrations during normal operations can be as high as 384 mg/l. Our Bissell Point influent iron has been observed to vary between 1.29 mg/l and 5.8 mg/l. At this time we believe we can honor your request and allow you to continue to discharge your existing levels of iron without any pretreatment or process modification.

Please be advised, should an NPDES effluent limitation for iron be established for our Bissell Point Sewage Treatment Plant, we may be required to withdraw this approval and request you initiate substantial process modification or install iron removal systems.

If you have any question concerning this qualified approval, please contact us.

Sincerely,

Bernard A. Rains

Bernard A. Rains, P.E., Manager
Industrial Pollution Control

BAR:kat

cc: / Roger Wieting
Jim Grant
Lee Powers

cc: Schillinger ✓

JS

MEMO TO: Mr. Rogers
 FROM: Mr. Folger
 DATE: May 14, 1966
 SUBJECT: Millbrook Sewerage Plant Cleaning

Mr. Norman Folger, Plant Engineer Millbrook Sewerage Plant, called at 10:30 a.m. today to inform the District that they wanted to clean two settling ponds at their plant. Mr. Folger told me that he generally calls Al prior to starting work and that the cleaning would take approximately 4 days. I told him that the District was at a high river stage and was expected to go higher this week. I ask that he wait for me to check if their flow would reach us during this river stage.

Mr. Rogers was able to check and informed me that Millbrook Chemical discharges to the Salisbury trunk sewer. This sewer is currently discharging to the river and does so at river stages above about 15 feet.

I called Mr. Folger back and ask that they delay the scheduled cleaning until the river fell. He agreed and said that he would call back in a couple of weeks.

BT:TL
 cc: Mr. Rogers
 Mr. Al Folger
 Mr. Rogers

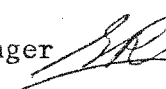
MEMO TO: File
 FROM: Jeff Thompson
 DATE: May 19, 1988
 SUBJECT: Mallickrod Settling Basin Cleaning

Mr. Norman Folgham, Plant Engineer Mallickrod Chemical, called at 10:30 a.m. today to inform the District that they wanted to clean two settling ponds at their plant. Mr. Folgham told me that he generally calls Al prior to starting work and that the cleaning would take approximately 4 days. I told him that the investigation was at a high river stage and was expected to go higher this week. I ask that he wait for me to check if their flow would reach us during this river stage.

Lee Powers was able to check and informed me that Mallickrod Chemical discharges to the Salisbury trunk sewer. This sewer is currently discharging to the river and does so at river stages above about 15 feet.

I called Mr. Folgham back and ask that they delay the scheduled cleaning until the river fell. He agreed and said that he would call back in a couple of weeks.

BT:ldj
 cc: Roger Weising
 Al Catter
 Bernice Rains

MEMORANDUM TO: Roger Wieting
FROM: George R. Schillinger 
RE: Discharges from Mallinckrodt
DATE: March 2, 1982

As a follow-up to my earlier memos concerning the draining of Mallinckrodt's basins, the draining will be accomplished on March 9, 1982 with the cooperation of pump station personnel.

From our discussion, it appears that the reason for diverting the Salisbury system to the river at stage 12 is the absence of the 42" x 42" flap gate on the Mallinckrodt Sewer. I would recommend that a repair or replacement of the gate be considered. Several reasons for this repair are summarized as follows:

1. With the system operating at stage 12, Mallinckrodt's discharge is diverted to the river about 45 percent of the time. This could be reduced to about 18 percent of the time if the system could be operated until river stage 20.
2. Mallinckrodt could possibly claim that they are being improperly charged for treatment which has not been provided.
3. When Mallinckrodt requests to clean their basins, they are discharging at least one million gallons of sludge. Under the present operating conditions, Mallinckrodt is being given permission to discharge to the river. This would be a most serious violation of the NPDES permit program as I understand it.
4. If the system is restored to an operating condition of river stage 20, Mallinckrodt could schedule their basin cleaning at lower river stages.
5. The District's ordinances force Mallinckrodt to request to clean the basins as the loss of basin capacity results in excessive pH excursions.

I presume that the replacement of the flap gate is both expensive and difficult. However, considering the above, the replacement should be reconsidered.

GRS:smr

CC: B. A. Rains

MEMORANDUM TO: Roger Wieting
FROM: George R. Schillinger *GRS*
RE: Draining of Mallinckrodt's Basins
DATE: March 1, 1982

I discussed the problem of draining Mallinckrodt's basins with Jack Kerns. Kerns offered to isolate the Salisbury system, reconnect it to the interceptor and man the pump station while the basins are being cleaned.

On February 26th, I called Roger Johnson at Mallinckrodt and advised him as to how the basins could be cleaned at this time. I told him that we would make special arrangements with the Pump Station Division to isolate the Salisbury system and allow Mallinckrodt to clean their basins. I suggested that the work begin on a Tuesday morning and continue around-the-clock until completed. Johnson wasn't very receptive to this method. Apparently, they only worked the day shift in the past when cleaning the basins. However, since the river gates require a half day to close and also to open ^{and} during that period, the pump station must be manned, the around-the-clock operation is a reasonable requirement. Johnson was to get back to me with Mallinckrodt's decision.

I also mentioned to Johnson that this procedure would be impossible to complete during flood stage (above 30 feet) as the District would not have available personnel.

Johnson called back on March 1 and requested that we isolate the system Tuesday and that they would then begin cleaning their basins. I initially told him that I didn't see any problem but would confirm it.

This was discussed with Jack Kerns, and then John Koeper called back with a concern about collapsing the sewer during this dewatering operation with a high ground water table. I told Koeper that I could stall for a week to 10 days, and we agreed to put this procedure off for the present.

I called Norm Fulgham (982-⁵¹⁰⁴~~5079~~) and informed him that it was not possible for the District to proceed with this operation for a week to 10 days. Johnson (982-5079) will call back to make other arrangements.

GRS:smr

CC: B. A. Rains

Al Tathrie - Power House
982-5104
per Roger Johnson 3/1/82
do on 3/9/82

MEMORANDUM TO: Roger Wieting
FROM: George R. Schillinger
RE: Discharge of Mallinckrodt's Basins
DATE: February 22, 1982

On February 19, Roger Johnson of Mallinckrodt made arrangements to empty both settling basins at his facility on February 23 and 24.

On February 22, I was informed that the river stage was 23.7 feet. Since I questioned whether the discharge would be received at the plant, I called John Melton. He told me that the Salisbury System is cut out of the interceptor at stage 12. Therefore, anytime Mallinckrodt cleans the basins above stage 12, the discharge is direct to the Mississippi River.

Melton further indicated that whenever Mallinckrodt cleans these basins that the system is surcharged and much of the discharge overflows to the Mississippi River. There apparently is no effort at Mallinckrodt to control the discharge and prevent the overflow.


Since I am not familiar with previous arrangements with Mallinckrodt concerning these discharges, I had intended to let this incident pass and work out future procedures for handling the basin cleaning discharges. However, Mr. Johnson called to confirm the arrangements of last week. I told Johnson that the discharge would have no effect on the plant since it was being diverted to the Mississippi. I told Johnson that I was not sure of the NPDES permit implications or Mallinckrodt's liability if they were to clean the basins, but I recommended that the basin cleaning be halted at this time. Mr. Johnson agreed.

At least two items need to be worked out with Mallinckrodt:

1. The clean-out of their basins should not be done at river stages of 12 or more. From B & V's report, this would limit the discharges to about one half of the year.
2. The discharges from Mallinckrodt's basins during cleaning should be controlled to prevent surcharging the line and spilling to the Mississippi.

GRS:smr

CC: B. A. Rains
J. Melton
A. Callier

MEMORANDUM TO: Roger Wieting
FROM: George R. Schillinger 
RE: Mallinckrodt Discharges
DATE: February 24, 1982

Mr. Roger Johnson called me again today requesting permission to discharge their basins. I again told him that I would not recommend it and he said that they would not.

Several questions arise:

1. Since it will be discharged to the river at stage 12 and above, would they be violating our permit if they were to discharge with or without our permission?
2. Do they need our permission?

Johnson sounds as if he is most anxious to dump these basins and is pressing for a statement as to when he can complete this project. I have not mentioned that their discharges go to the river at stage 12 but have only indicated that the current problem is due to high river stage.

GRS:smr

CC: B. A. Rains
A. Callier